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Attorneys for Claimants  
 First 100, LLC; 1<sup>st</sup> One Hundred Holdings LLC;  
 and Battle Born Investments Company, LLC

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

APPROXIMATELY 69,379 BITCOIN (BTC),  
 BITGOLD (BTG), BITCOIN SV (BSV), AND  
 BITCOIN CASH (BCH) seized  
 from 1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8  
 Hbhx

DEFENDANTS.

FIRST 100, LLC, 1ST ONE HUNDRED  
 HOLDINGS, LLC, AND BATTLE BORN  
 INVESTMENTS COMPANY, LLC,

CLAIMANTS.

Case No.: 3:20-CV-07811-RS

**[PROPOSED] ORDER GRANTING  
 CLAIMANTS FIRST 100, LLC, ONE  
 HUNDRED HOLDINGS LLC, AND  
 BATTLE BORN INVESTMENTS  
 COMPANY, LLC'S EX PARTE  
 APPLICATION FOR: (1) STAY  
 PENDING APPEAL AND (2) STAY  
 ENFORCEMENT OF THE JUDGMENT**

**[PROPOSED] ORDER**

Claimants, First 100, LLC, 1st One Hundred Holdings, LLC, and Battle Born Investments Company, LLC's (collectively, "Claimants") Ex Parte Application for Stay Pending Appeal and Stay Enforcement of the Judgment came on for hearing before this Court, and the Court duly advised does hereby:

**FIND, ORDER AND ADJUDGE:**

1. Claimants Ex Parte Application for Stay Pending Appeal and Stay Enforcement of the Judgment is GRANTED.

2. The United States is ordered to not execute the judgment in this matter while Claimants' appeal in the matter of *Battle Born Invs. Co., LLC v. U.S. Dep't of Justice* ("FOIA Action"), No. 24-cv-0067 (BAH) (D.D.C.) is pending.

**IT IS SO ORDERED.**

Date: \_\_\_\_\_

THE HON. RICHARD SEEBORG  
CHIEF U.S. DISTRICT JUDGE